

U.S. Department of Justice

United States Attorney Eastern District of New York

DMP:ICR/JEA F. #2020R00508

271 Cadman Plaza East Brooklyn, New York 11201

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By File Sharing and ECF

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Re: United States v. Colinford Mattis and Urooj Rahman

Criminal Docket No. 20-203 (BMC)

Dear Defense Counsel:

Enclosed please find the government's third discovery production in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This supplements the disclosure of Rule 16 discovery produced to the defendants on July 11, 2020 and September 19, 2020. The government also reiterates its prior request for reciprocal discovery from the defendants.

| Records | Bates Number |
|--|------------------------|
| Final FBI Laboratory Report of Nuclear DNA | MATTIS_RAHMAN_000912 - |
| Examinations and Case Record 1A File | MATTIS_RAHMAN_000914; |
| | MATTIS_RAHMAN_000915 – |
| | MATTIS_RAHMAN_001006 |
| The Laboratory Operations Manual and Standard | MATTIS_RAHMAN_001007 |
| Operating Procedures utilized by the DNA Casework | |
| Unit | |
| Final FBI Laboratory Report of Latent Prints | MATTIS_RAHMAN_001008 - |
| Examinations and Case Record 1A File | MATTIS_RAHMAN_0001018; |
| | MATTIS_RAHMAN_001019 – |
| | MATTIS_RAHMAN_001074 |
| FBI Latent Prints Foray Report and Latent Print Images | MATTIS_RAHMAN_001075 - |
| | MATTIS_RAHMAN_0002442; |
| | MATTIS_RAHMAN_002443 |
| The Laboratory Operations Manual and Standard | MATTIS_RAHMAN_0002444 |
| Operating Procedures utilized by Latent Print Operations | |
| Unit | |
| Final Explosives Examinations Case Record 1A File | MATTIS_RAHMAN_002445 - |
| | MATTIS_RAHMAN_002524 |
| The Laboratory Operations Manual and Standard | MATTIS_RAHMAN_002525 |
| Operating Procedures utilized by the Explosives Unit | |
| | |

The government is also producing electronically stored information extracted from an Apple iPhone belonging to defendant Mattis and searched pursuant to a search warrant. The information listed in the table below was provided to the undersigned Assistant United States Attorneys (the "Prosecution Team") on Friday December 11, 2020, by a separate Filter Team of Assistant United States Attorneys not involved in the investigation and prosecution of this case. The Filter Team provided this information to the Prosecution Team after determining that it is not protected by the attorney-client privilege.

| Records | Bates Number |
|---|----------------------|
| Relevant electronic chat message threads involving both | MATTIS_RAHMAN_002526 |
| defendant Rahman and defendant Mattis, that include | |
| messages sent and received by Mattis's iPhone for the | |
| time period from May 25, 2020 through June 1, 2020 | |
| SMS text messages sent and received by defendant | MATTIS_RAHMAN_002527 |
| Mattis's iPhone during the time period from May 25, | |
| 2020 through June 1, 2020 | |
| A log of calls made, received and not answered by | MATTIS_RAHMAN_002528 |
| defendant Mattis's iPhone during the time period from | |
| May 25, 2020 through June 1, 2020 | |
| A timeline list of all recorded activity on defendant | MATTIS_RAHMAN_002529 |
| Mattis's iPhone during the time period from May 25, | |
| 2020 through June 1, 2020 | |

In addition to the specific records and information obtained from defendant Mattis's Apple iPhone listed above, pursuant to Federal Rule of Criminal Procedure 16(a)(1)(E)(iii), the Prosecution Team is producing to defendant Mattis under Bates number **Mattis000018** a copy of all of the non-privileged information extracted from Mattis's Apple iPhone and provided by the Filter Team to the Prosecution Team. The Prosecution Team understands that the Filter Team will separately provide to defendant Mattis an unfiltered copy of all of the information extracted from Mattis's Apple iPhone.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact the undersigned attorneys.

Very truly yours,

MARK J. LESKO Attorney for the United States Acting under Authority Conferred by 28 U.S.C. § 515

By: /s/
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Enclosures

cc: Clerk of the Court (BMC) (by ECF) (without enclosures)